



**Automotive Aftermarket  
Industry Association**

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Docket Management System  
U.S. Department of Transportation  
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400 Seventh Street, SW  
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**RE: Docket No. NHTSA-00-8296 -17**

*Certification; Federal Motor Vehicle Safety Standards; Tire Identification and Record-keeping;  
Consumer Information Regulations*

## OVERVIEW

The Automotive Aftermarket Industry Association (AAIA) consists of approximately 2,700 member companies involved in the manufacture, distribution, retail sale and installation of high quality automotive parts, fluids and accessories. Combined, these companies represent a significant portion of an industry that employs well over 2 million people and generates annual sales in excess of \$250 billion. The automotive aftermarket encompasses virtually all products and services provided to motorists after the vehicle rolls off the dealer's lot. AAIA's members have a direct and significant interest in the safety-related maintenance of passenger cars, light trucks and medium- and heavy-duty vehicles.

Some estimates place the value of neglected maintenance, including that related to safety, at over \$60 billion. This represents a significant percentage of the total preventive maintenance market and a huge opportunity for NHTSA and our industry to promote proper vehicle maintenance. AAIA believes that in many cases, consumers are not properly educated as to the need for automotive maintenance, nor are they sufficiently motivated to perform such maintenance. Education and the proper motivation can have a profound impact on maintenance behavior and as a result, public safety.

In the following comments AAIA will focus on the NHTSA's questions pertaining to consumer information, behavior (Section III, A., B. and C.) and the proposed TREAD regulations.

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## **INFORMATION AND CONSUMER EDUCATION**

In response for NHTSA's request for comment on the state of consumer knowledge related to tire maintenance, it is AAIA's experience that the vast majority of motorists rarely, if ever review the tire safety and maintenance information imprinted on their tires or published in their owners manuals. Fewer still act on those recommendations. Generally speaking, consumers purchase and/or maintain tires as a result of mileage (i.e. after a certain number of miles, tires should be changed), tire failure (punctures, blowouts, serious loss of traction due to wear, etc.), or professional inspection that reveals excess wear or other problems. Published inspection and maintenance schedules are routinely ignored and are rarely a factor in promoting tire maintenance activities.

There are several reasons for this neglect, not the least of which is a lack of awareness about the need for tire maintenance and confusion regarding the various codes and ratings that pertain to tires. While a small percentage of motorists understand and respond to load and speed ratings, tread wear indicators, ply and cord materials, the vast majority remains oblivious to these important data. In the above-referenced ANPRM, NHTSA notes that even tire pressure, by far the most widely understood tire maintenance item, is frequently neglected by motorists.

NHTSA requirements to increase the visibility and understandability of safety information on the tire or the vehicle, while well intentioned, will likely have little practical impact on tire maintenance, use or purchase behavior.

## **MANDATED SAFETY INSPECTIONS**

On the other hand, regular safety inspections could provide the necessary motivation for consumers to properly maintain their vehicles, including tires. Maintenance and repair facilities have the skill and expertise to accurately assess the condition of automotive safety components. Based upon that assessment, courses of action can be recommended including tire inflation/deflation, rotation, or replacement. Concurrently, a variety of other safety-related components and systems can be inspected including lights, wipers, brakes, etc.

It is clear that most motorists are disinclined to either routinely inspect their own vehicles or have this service performed by others. Indeed a number of the unfortunate Firestone tire failures could likely have been avoided through proper inflation and/or inspection of the tires. Mandated safety inspections would provide motorists with the necessary incentive to ensure that these critical inspections take place and that they receive an early warning of any pending problems.

Public safety would be well served by a NHTSA initiative to encourage and support the expansion of state mandated safety inspection programs. This effort would be consistent with the safety mandates of TREAD, as tire inspections would be a key component of any such program.

## **IMPROVED AVAILABILITY OF SAFETY-RELATED SERVICE INFORMATION**

While not directly related to this rulemaking, NHTSA also should consider regulation that would provide for improved access to safety-related information for both the public and non-dealer service facilities. Since the vast majority of car owners patronize independent service facilities or perform maintenance work themselves, access to this safety information beyond just the dealer facilities is critical. The U.S. Environmental Protection Agency already has significant service information requirements for emissions-related components. NHTSA should consider extending such requirements to safety-related data. In fact, EPA is considering revising its service information rules to require car companies to maintain web sites that contain all service information relating to emissions systems. A requirement that the web sites also contain information for consumers and independent technicians regarding safety-related components and recalls would also be a cost effective method for improving vehicle safety. AAIA would be willing to further discuss this issue with the Agency at the appropriate time.

## **CONCLUSION**

NHTSA is to be commended for its rapid response to the call for TREAD regulations. The information and improvements described in the above-referenced ANPRM are generally reasonable and well thought-out. However, improved tire labeling is only part of the solution. Consumers must absorb and understand that information. Most importantly, they must be motivated to act upon it. Finally, in order to provide thorough inspections and high quality maintenance/repair, the independent aftermarket must have access to the tools and information required for servicing all safety-related components.

In the opinion of AAIA, the goal of improved tire safety can only be achieved through the combination of improved information availability (to consumers and the aftermarket) together with mandated safety inspection programs.

AAIA and the automotive aftermarket stand ready to assist NHTSA in promoting such initiatives.

Sincerely,



Aaron M. Lowe  
Vice President  
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